

## REMARKS

Applicants request favorable reconsideration and withdrawal of the rejections set forth in the above-noted Office Action, in light of the foregoing amendments and the following remarks.

Claims 1-12, 14, 15, and 17-26 are presented for examination, with claims 1 and 12 being independent. The independent claims have been further amended to more clearly recite Applicants' invention. Support for these amendments may be found at paragraph [0011], as well as in Fig. 1. No new matter has been added by any amendment.

Claims 1-12, 14, 15, and 17-26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0049853 to Chu et al. ("Chu") in view of newly-cited U.S. Patent Publication No. 2003/0041095 to Konda et al. ("Konda"). Applicants disagree.

Independent claim 1 recites a system to facilitate movement of electronic files that includes a messaging infrastructure component, a file transfer services component, a file transformation component, and a centralized file management hub. The centralized file management hub includes a file tracking and monitoring component, which is configured to provide end-to-end tracking of a file and role based multi layered tracking information. Only the file transfer services component provides to a user an entry point into the system. An example of a system configured in this manner is illustrated in Fig. 1.

In rejecting claim 1, the Office Action relies on Chu for teachings of a messaging infrastructure component and a centralized file management hub that includes file tracking and monitoring components. Applicant submits, however, that the Chu publication fails to teach or suggest the messaging infrastructure component as recited in claim 1. In the Chu system, the

client device is controlled by client software, which is operated by a user, as discussed at paragraph [0051] of Chu. Thus, the client device provides an entry point for the user into the Chu system. In contrast, a feature of the claimed messaging infrastructure component is that it does not provide an entry point for the user into the system. Accordingly, Chu fails to teach the features of the messaging infrastructure component, as recited in claim 1.

In the outstanding Official Action, the Examiner indicated that the present specification does not explicitly disclose the limitation of the messaging infrastructure component not providing an entry point for the user into the system because Figure 1 allegedly discloses that the message infrastructure and centralized file management hub had bidirectional communication via the Internet. Applicants respectfully disagree.

More specifically, the Examiner will appreciate that Figure 1 depicts a representative example of Applicants' system with three primary components as set forth in the claims. The figure illustrates a messaging infrastructure component 10, a file transfer services component 30 and a centralized file management hub 60. Of these three components, only the file transfer services component is depicted as having an entry point for a user into that component via the Internet. More specifically, the only entry point for a user to utilize is contained in the file transfer services component. This entry is illustrated in Figure 1 as via the Internet or Intranet.

The messaging infrastructure referred to in the official action is illustrated as communicating with a web server 20. However, this is not an entry point for a user into the system. To the contrary, this merely provide access for the manager interface. To more clearly recite this feature, Applicants have amended claim 1 to recite that the messaging infrastructure component does communicate with a manager interface and does not provide an entry point for a user into the system. The centralized file management hub has also been amended to more

clearly recite how this component interrelates with the system. Thus, as illustrated in Figure 1, it communicates with the file transfer services component via the messaging infrastructure, and specifically does not provide an entry point for a user into the system.

Applicants therefore respectfully submit that as amended claim 1 clearly distinguish over the system of Chu as set forth in the prior Amendment of August 11, 2009.

Independent claim 12 incorporates at least the above salient features discussed in relation to claim 1 and is patentable for reasons noted above with respect to claim 1, as well as in its own right.

The remaining claims in the above application are dependent claims which depend from claims 1 or 12 and are therefore patentable for reasons noted above. In addition, each recites features of the invention further distinguishing it from the prior art. Favorable and independent consideration thereof is respectfully sought.

Applicants submit that all outstanding matters in the above application have been addressed and that this application is now in condition for allowance. Favorable consideration and early passage to issue are respectfully sought.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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